

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

DELPHI CORPORATION, et al.
Debtors-in-Possession.

Case No. 05-44481 (RDD)
Chapter 11 - Jointly Administered
Honorable Robert D. Drain

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NOTICE OF RECLAMATION DEMAND BY LINAMAR CORPORATION

Linamar Corporation (“Linamar”), by its unsigned counsel, hereby makes this Reclamation Demand pursuant to 11 U.S.C. §546(c)(1); MCLA 440.2702(2)(the Michigan Uniform Commercial Code) and procedures established by Order of the United States Bankruptcy Court for the Southern District of New York, dated October 13, 2005 and entered on October 14, 2005.

Linamar’s reclamation claim is for all inventory, products, equipment, parts, accessions and related materials (collectively the “Goods”) which were shipped pursuant to the invoices on the shipment dates and in the amounts set forth in the schedules attached hereto as Exhibit A. All Goods were delivered between the time period of September 28, 2005 through October 8, 2005. Purchase orders describing the Goods are attached hereto as Exhibit B.

To the extent that the Debtors fail and/or refuse to return the Goods, Linamar asserts an administrative priority claim relating to the Goods in the amount of \$768,455.15, the invoice price. Linamar expressly reserves any and all other rights and remedies it may possess against the Debtors, including those with respect to the Goods or its claim for the Goods, and any right to amend this reclamation at a later date.

Respectfully submitted,

LAMBERT, LESER, ISACKSON,
COOK & GIUNTA, P.C.

Dated: 10/18/05

By: /s/ Susan M. Cook
SUSAN M. COOK (P31514)
Attorneys for Creditor Linamar Corporation
916 Washington Avenue, Suite 309
P.O. Box 835
Bay City, Michigan 48707
Telephone: (989) 893-3518, Fax (989) 894-2232
scook@lambertleser.com